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IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF MISSISSIPPI ABERDEEN DIVISION

JESSICA JAUCH PLAINTIFF

VERSUS NO. 1:15CV75-SA-SAA

CHOCTAW COUNTY AND CLOYD HALFORD, In His Individual Capacity

DEFENDANTS

MOTION FOR PARTIAL SUMMARY JUDGMENT

COMES NOW the Plaintiff, Jessica Jauch, by and through counsel of record, pursuant to Fed. R. Civ. P. 56, and moves the Court for partial summary judgment on her claim that the Defendant Cloyd Halford and the Defendant Choctaw County are liable to her for violating her clearly established constitutional rights under the Fourteenth Amendment, the Sixth Amendment, and the Eighth Amendment. In support of this motion Ms. Jauch would show that no genuine issue as to any material fact exists regarding her claims as to liability and that she is entitled to judgment as a matter of law.

In support of this motion, Ms. Jauch relies on her Memorandum in Support of Motion for Partial Summary Judgment, the Stipulation of Facts with attached evidentiary materials, and the following evidentiary materials:

1. Declaration of Debra Odom, attached hereto as Exhibit "A."

WHEREFORE, PREMISES CONSIDERED, Ms. Jauch requests that this Court grant this Motion for Partial Summary Judgment and enter judgment as to liability

against the Defendant Halford and the Defendant Choctaw County and in favor of Ms. Jauch.

Respectfully submitted, this the 20th day of June 2016.

/s/ Victor Israel Fleitas

VICTOR I. FLEITAS MS BAR NO. 10259

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Attorney for Jessica Jauch

CERTIFICATE OF SERVICE

I hereby certify that on June 20, 2016 I electronically filed the foregoing with the Clerk of the Court using the ECF system which sent notification of such filing to the following:

Daniel J. Griffith, Esq. Jacks, Griffith & Luciano Post Office Box 1209 Cleveland, Mississippi 38732 dgriffith@jlpalaw.net

This the 20th day of June, 2016.

/s/ Victor Israel Fleitas

VICTOR I. FLEITAS